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BY ECF

Hon. Frank P. Geraci, Jr. United States District Judge U.S. Courthouse 100 State Street Rochester, New York 14614

Re: Hall et al. v. Warren et al., No. 21-cv-6296 (FPG)

Your Honor,

As one of Plaintiffs' attorneys in this matter, I write jointly on behalf of the parties to advise the Court that we have agreed to pause mediation and proceed with discovery. We are tremendously grateful for the efforts of Judge DeArcy Hall and Judge Feldman and their teams. Their efforts helped focus the parties' discussions throughout the mediation process. But it has become clear the parties do not yet have enough information about the complicated issues in this case, such that discovery is needed before the parties can continue meaningful negotiations. Accordingly, we request the Court refer the case to a magistrate judge for discovery to begin as soon as possible.

The parties discussed with the Mediators and all agreed we should reconvene in six months to discuss the progress of discovery and, if appropriate, whether to re-open the mediation process.

We appreciate the Court's time and attention to this request.

Sincerely,

Joshua S. Moskovitz

cc: All Counsel of Record Hon. LaShann DeArcy Hall

Hon. Jonathan W. Feldman